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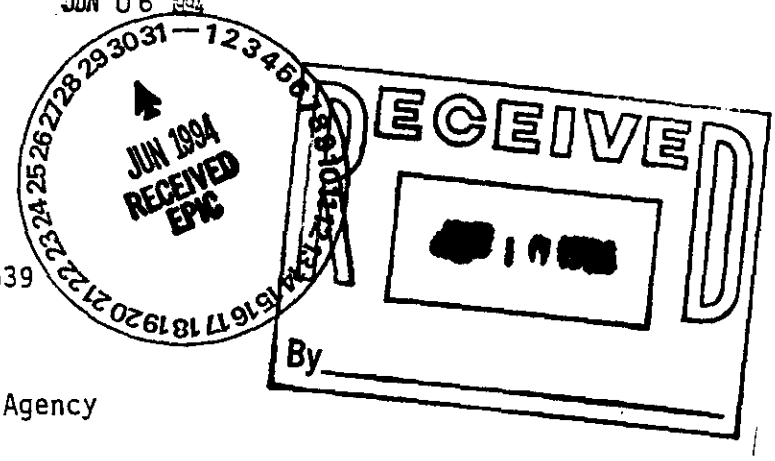

94-ERB-127

Mr. Dave C. Nylander
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 1386, MSIN N1-05
Richland, Washington 99352-0539

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

9413290.1065

Dear Messrs. Nylander and Sherwood:

SAMPLING REQUIREMENTS FOR 200-BP-11/216-B-3 MAIN POND

This letter responds to the State of Washington Department of Ecology's (Ecology) letter to S. H. Wisness from D. C. Nylander, "Sampling Requirements for 200-BP-11/216-B-3 Pond," dated December 20, 1993. The letter requested an analysis of the constituent list in Appendix IX of 40 Code of Federal Regulations 264 for the Resource Conservation and Recovery Act (RCRA) 200-BP-11/216-B-3 Pond treatment, storage, or disposal (TSD) unit. A Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change request #M-13-93-01 was signed on August 3, 1993, to integrate sampling and remediation activities related to RCRA TSDs and past practice waste management units within the 200-BP-11 RCRA past practice unit in the 200 East Area. The U.S. Department of Energy, Richland Operations Office (RL), the U.S. Environmental Protection Agency (EPA), Ecology, and the contractors began the Data Quality Objectives (DQO) process to determine how to accomplish this integration in an efficient and cost effective manner.

RL and the Westinghouse Hanford Company (WHC) have compared Appendix IX with a list of potential contaminants used in facilities that had the potential to discharge to the 216-B-3 Main Pond. This list of potential contaminants of concern was developed from the B-Plant and PUREX Aggregate Area Management Study (AAMS) reports. The AAMS reports used process knowledge and historical information to develop a list of all chemicals used in the subject Aggregate Areas. It is reasonable to assume chemicals not on the AAMS report were not used in the facilities in the 200 East Area and could not be contaminates in 215-B-3 Main Pond. RL and WHC believe this chemicals-used list developed from the AAMS reports is appropriate to compare with the Appendix IX. Additional information gleaned from near surface sampling of Phases I, II, and III show no contaminants other than metals.

During the DQO process for the 200-BP-11/216-B-3 Pond, an analytes of concern list was developed for the 200-BP-11 Operable Unit (OU). This analytes of concern list includes all of the contaminants generated from the comparison of

Appendix IX chemicals with the chemicals identified in the B-Plant and PUREX AAMS reports. Ecology had concerns about the accuracy of the AAMSs reports. An agreement was reached between RL, Ecology and WHC in the March 17, 1994, DQO meeting on sampling and analysis. The Appendix IX list using EPA SW-846 methods for analysis excluding methods 8280 (dioxins), 8150 (herbicides), 8140 (phosphorous pesticides), and 8015 (non-halogenated volatile organics) will be the Target Analyte list for the TSD within the 200-BP-11 OU. All tentatively identified compounds will be reported for volatile organic compounds and semi-volatile organic compounds.

Should you have any questions, please contact Mr. R. G. McLeod, RL, at 372-0096 or Mr. F. A. Ruck III, WHC, at 376-9876.

Sincerely,

Steven H. Wisness, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

END:RGM

W. T. Dixon, Manager
Regulatory Support
Westinghouse Hanford Company

cc: W. Dixon, WHC
D. Duncan, EPA
S. Price, WHC
F. Ruck, III, WHC
J. Wallace, Ecology
EDMC Records, H6-08

- APPENDIX IX

The following SW-846 methods are required by the 40 CFR Pt.264, Appendix IX Groundwater Monitoring List:

8015 non-halogenated volatile organics
8080 pesticides/PCBs
8140 phosphorous pesticides
8150 herbicides
8240 volatile organics
8270 semivolatile organics
8280 dioxins

6010 ICP metals
7471 Hg
7000 series (optional for some elements to provide lower detection limits than ICP; typically used for As, Pb, Se, Tl)

9010 cyanide
9030 sulfide

- CONTAMINANT OF CONCERN TABLE REVISIONS

The following PQLs apply for the Inorganic COC list:

Analyte	PQL (mg/kg)	Method
As	10	6010
	0.3	7060
B	10	6010
Ba	1	6010
Be	0.7	6010
Bi	see 1/11 DSI	
Cd	2	6010
Cr(total)	2	6010
CrVI	see note below	
Cu	2	6010
Fe	10	6010
Pb	10	6010
	0.3	7421
K	500	6010
Mn	1	6010
Hg	0.1	7471
Ni	4	6010
Se	25	6010
	0.3	7740
Ag	20	6010
Sn	50	7870
V	2	6010
Zn	2	6010
U	see 1/11 DSI	

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL W. T. Dixon, WHC (D. A. Guthrie, WHC)	D. C. Nylander, Ecology D. R. Sherwood, EPA	Incoming 9403696 XRef:9450321D

Subject: SAMPLING REQUIREMENTS FOR 200-BP-11/216-B-3 MAIN POND

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